

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In Re: BP P.L.C. SECURITIES LITIGATION</b>	)	<b>MDL No. 2185</b>
	)	
	)	<b>Civil Action No. 4:10-md-02185</b>
	)	
	)	<b>Hon. Keith P. Ellison</b>
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<b>In Re: BP ERISA LITIGATION</b>	)	<b>Civil Action No. 4:10-cv-04214</b>
	)	
	)	<b>Hon. Keith P. Ellison</b>
	)	
	)	

**PLAINTIFFS' JOINT REPORT  
ON PROPOSED ORGANIZATIONAL STRUCTURE**

Now come the Plaintiffs in the BP ERISA Litigation and make this Joint Report to the Court on Proposed Organizational Structure and would respectfully show the Court the following:

The BP ERISA Plaintiffs have worked diligently to resolve the competing motions to appoint lead counsel (Case No. 4:10-cv-04214, Docket Nos. 9-11 and 27-31; Case No. 4:10-mdl-2185, Docket Nos. 44-46, 67-70, 77, 81 and 83-85) and now have consent from all Plaintiffs and their counsel in the ERISA actions to propose the following organizational structure for the ERISA Plaintiffs subject to approval by this Court: The Liner Grode firm and Milberg LLP would serve as co-lead counsel with an Executive Committee consisting of Harwood Feffer LLP and Squitieri & Fearon, LLP. Ajamie LLP and The Lanier Law Firm would serve as co-liaison counsel. Plaintiffs will submit a proposed order for the Court's consideration by February 10, 2011.

DATE: February 3, 2011

Respectfully submitted,

*/s/ Thomas R. Ajamie*

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Plaintiffs' Joint Report on Proposed Organizational Structure has been served through the Court's electronic filing and notification system on February 3, 2011.

*/s/ Thomas R. Ajamie*

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Thomas R. Ajamie